

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to: 1:18-cv-05374; 1:18-cv-08655; 1:18-cv-05053; 1:18-cv-09797; 1:18-cv-10100

MASTER DOCKET
18-md-2865 (LAK)

**STIPULATION AND [PROPOSED] ORDER EXTENDING
TIME TO ANSWER COUNTERCLAIMS**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties that the deadlines to answer or otherwise respond to the counterclaims asserted in the answers filed by Third-Party Defendant, ED&F Man Capital Markets Ltd., on March 2, 2020 (D.E. 280, 281, 282, and 283) (the “Counterclaims”) are extended by one week up to and including March 30, 2020.

No provision of this Stipulation and Order shall be construed as a waiver of, and Third-Party Plaintiffs expressly reserve, all defenses.

This is the parties’ first request to extend the deadline to answer or otherwise respond to the Counterclaims.

Dated: New York, New York
March 20, 2020

By: /s/ Eric Smith
Bryan C. Skarlatos
Eric Smith
KOSTELANETZ & FINK LLP
7 World Trade Center
250 Greenwich Street

By: /s/ Brian Fraser
(e-signed with consent)
Brian S. Fraser
Kristen G. Niven
AKERMAN LLP
666 Fifth Avenue, 20th Floor

New York, NY 10007
Telephone: (212) 808-8100
bskarlatos@kflaw.com
esmith@kflaw.com

Counsel for Third-Party Plaintiffs and Counterclaim Defendants Del Mar Asset Management Savings and Retirement Plan, Federated Logistics LLC 401(K) Plan, and David Freelove

New York, NY 10103
Telephone: (212) 880-3800
Fax: (212) 905-6458
brian.fraser@akerman.com
kristen.niven@akerman.com

Counsel for Third-Party Defendant and Counterclaim Plaintiff ED&F Man Capital Markets, Ltd.

By: /s/ John Blessington
(e-signed with consent)
John Blessington
Brandon Dillman
K&L GATES LLP
State Street Financial Center
One Lincoln Street
Boston, MA 02111
Telephone: (617) 261-3100
John.blessington@klgates.com
Brandon.dillman@klgates.com

Counsel for Third-Party Plaintiffs and Counterclaim Defendants DW Construction, Inc. Retirement Plan, Kamco Investments, Inc. Pension Plan, Kamco LP Profit Sharing Pension Plan, Linden Associates Defined Benefit Plan, Moira Associates Defined Benefit Plan, Riverside Associates Defined Benefit Plan, American Investment Group of New York, L.P. Pension Plan, Stacey Kaminer, Joan Schulman, and David Schulman

By: /s/ Marty Kaplan
(e-signed with consent)
Martin H. Kaplan
Kari Parks
GUSRAE, KAPLAN, NUSBAUM, PLLC
120 Wall Street
New York, NY 10005
Telephone: (212) 269-1400
mkaplan@gusraekaplan.com

kparks@gusraekaplan.com

*Counsel for Third-Party Plaintiffs and
Counterclaim Defendants, The Goldstein
Law Group PC 401(K) Profit Sharing
Plan and Sheldon Goldstein*

By: /s/ John Blessington

(e-signed with consent)

John Blessington

Brandon Dillman

K&L GATES LLP

State Street Financial Center

One Lincoln Street

Boston, MA 02111

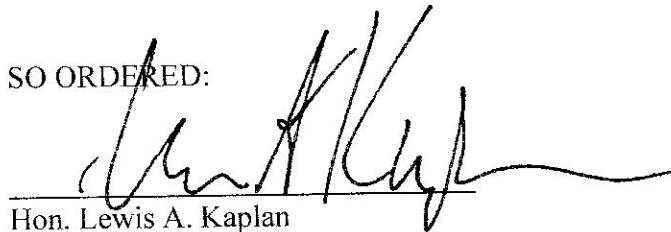
Telephone: (617) 261-3100

John.blessington@klgates.com

Brandon.dillman@klgates.com

*Counsel for Third-Party Plaintiffs and
Counterclaim Defendants, Newsong
Fellowship Church 401(K) Plan and
Alexander Jamie Mitchell III*

SO ORDERED:


Hon. Lewis A. Kaplan
United States District Judge

3/27/2020